Remarks

In an Office Action dated 23 June 2003, the Examiner rejected claims 1-3, 8-10 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent 6,101,480 issued to Conmy, and rejected claims 4-7, 11-14 under 35 U.S.C. §103(a) as being unpatentable over the Conmy Patent as applied to claims 1, 8 and further in view of U.S. Patent No 5,754,306 issued to Taylor. The Examiner further rejected claims 15-16, 24-25 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No 6,253,203, issued to O'Flaherty and claims 17-23, 26-32 under 35 U.S.C. §103(a) as being unpatentable over the O'Flaherty Patent as applied to claims 15, 24 and further in view of published PCT Application WO 94/16398 issued to Page. Applicant presents the following remarks in support of patentability.

Previously Submitted Arguments - Conmy Patent

The Examiner rejected claims 1-3, 8-10 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent 6,101,480 issued to Conmy, and rejected claims 4-7, 11-14 under 35 U.S.C. §103(a) as being unpatentable over the Conmy Patent as applied to claims 1, 8 and further in view of U.S. Patent No 5,754,306 issued to Taylor, noting with respect thereto:

> As to claims 1 and 8, Conmy teaches a system which including 'a data Management system for automatically maintaining address information in user address books' [see Abstract, col 1, line 60-65, fig 1, element 202, element 212], examiner interpreting address book corresponds to Conmy's electronic calendar that maintains name and address book for users as detailed in col 1, line 62-64, 'means for storing, for each of a plurality of subscribers, a subscriber address book comprising a plurality of entries, each entry corresponding to a named individual' [col 1, line 60-67, col 2, line 1-3, col 3, line 45-55, fig 1], Conmy specifically teaches database element 200 stores one or more profiles, element 202, one or more calendar files element 210, and one or more name and address files element 212 as detailed in fig 1, further it is noted that name and address files element 212 containing list all of the names and electronic mail addresses for a plurality of all of the users as detailed in col 3, line 51-53, also it is noted that Conmy specifically teaches for example name and address file may be created for each invitee, [col 3, line 52-53], 'means for storing a set of individual data, including address data, for each of said individuals listed in each subscriber address book for said plurality of subscribers' [col 3, line 38-49, line 66-67, col 4, line 1-5], subscribers corresponds to users, individual data including address data for each individual corresponds to user profiles associated with

respective names and addresses as detailed fig 1, element 202, 212, 'responsive to a change in a set of said individual data associated with an identified individual, for propagating said change to ones of said plurality of subscriber address books which contain an entry corresponding to said identified individual' [col 8, line 66-67, col 9, line 1-5, col 10, line 34-39], Conmy teaches specifically name/address book is kept for each person are in the same database, so that calendar information may be exchanged, identified individual corresponds to user based on user profile.

Applicant has carefully reviewed the cited Conmy Patent and the Examiner's remarks and presents the following arguments in support of patentability.

The Conmy Patent discloses a meeting reservation system for a networked computer system that contains a single address list (212) of the users who are connected to the network. The single list of users includes the user's name and address [column 3, lines 50-52]. The Conmy system also stores profile data (202) that notes the user's hours of work, physical location, etc and calendar data (210) that catalogs existing meeting commitments [column 3, lines 56-64]. The profile and calendar data is necessary for the Conmy system to determine a user's availability for meetings that are to be scheduled [column 5, lines 45-62]. The Conmy system is therefore a single flat file that contains n entries, one for each user, including the user profile data. The Conmy Patent fails to show or suggest a system that stores a plurality of user personal address books, each of which contains a plurality of entries input by the user, with each entry containing the identity of an individual as well as data associated with that individual, such as address data. In fact, the Conmy system does not enable a user to generate their own personal address book, since there is a single common address list (212) for all users. The Conmy Patent also fails to show or suggest the coordinated management of the users' personal address books in the form of address updates, since there are no personal address books in the Conmy system and this system is exclusively directed to the task of scheduling meetings and is exclusively a single layer system of n user profiles, all of which are stored in a single address list (212). Therefore, the propagation of changes, as claimed by Applicant, is impossible to implement in the Conmy system, since this is a single layer system, with the user profile changes impacting only a single entry in the single

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address list (212).

In contrast, Applicant's address book maintenance system is a hierarchical system that contains a plurality of user address books, each of which contains a plurality of entries, one for each individual selected by the user, including individual address data. Applicant's system is therefore a multi-layer system wherein n address books are maintained by Applicant's system, each of which contains m entries, and each entry containing k data entries, each associated with the individual identified by that entry. Applicant's system also automatically propagates changes to the address book entry data corresponding to an identified individual, as entered by a subscriber into their address book, to all other address book entries corresponding to the identified individual in the address books of other subscribers. Thus, each subscriber maintains their own address book of individuals, and Applicant's system ensures that all the corresponding entries in all of the subscribers' address books are consistent. For example, when an individual moves, their address data, when changed by one subscriber, is automatically changed for all subscribers who have this individual listed in their personal address book. This structure is clearly stated in claim 1 for example:

> A data management system for automatically maintaining address information in a plurality of subscriber address books, comprising:
>
> means for storing a plurality of subscriber address books, each said address book comprising a plurality of entries, each entry corresponding to a named individual and including address data for each of said named individuals; and
>
> means, responsive to a change in a set of said individual data associated with an identified individual, for propagating said change to ones of said plurality of subscriber address books which contain an entry corresponding to said identified individual.

Applicant believes that independent claims 1 and 8 are allowable under 35 U.S.C. §102(e) over the cited Conmy Patent since the Conmy Patent fails to show or suggest Applicant's recited "means for storing a plurality of subscriber address books, each said address book comprising a plurality of entries, each entry corresponding to a named individual and including address data for each of said named individuals," or "means, responsive to a change in a set of said individual data associated with an identified individual, for propagating said change to ones of said plurality of subscriber

address books which contain an entry corresponding to said identified individual." Applicant believes that claims 2-3, 9-10 are allowable under 35 U.S.C. §102(e) over the cited Conmy Patent since these claims depend on an allowable base claim. Applicant also believes that claims 4-7, 11-14 are allowable under 35 U.S.C. §103 over the Conmy Patent as applied to claims 1, 8 and further in view of U.S. Patent No 5,754,306 issued to Taylor since these claims depend on an allowable base claim.

Response to Examiner's Response to Arguments - Conmy Patent

In response to Applicant's amendment dated 30 May 2003, the Examiner maintained the rejection of the pending claims and noted:

> 30.   At page 5, line 15-19, Claims 1 and 8, 'the Conmy Patent fails to show or suggest a system that stores [sic] a plurality of user personal address books, each of which .... individual, such as address data.'
>
> As to the above argument, Examiner disagree with the applicant because firstly Conmy Is directed to electronic calendar that with group(s) of users to share information in a client/server environment [see fig 1], secondly Conmy teaches various elements in a database that including for example various users associated with individual profiles such as user profiles element 202, as detailed in fig 1, and thirdly, all the listed above elements are part of database element 200, further it is noted that names and address are related to user profiles or treated to be users personal address book used for group scheduling based on user availability as detailed in col 1, line 60-65.
>
> It is noted that Conmy specifically teaches for example database to store not only user profiles, but also stores related names and addresses, further Conmy specifically suggests for example Fig 1 may comprise one or more databases element 200 storing one or more profiles element 202, therefore, storing one or more user profile, one or more user personal address books associating individual address data is integral part of Conmy's teaching.

Applicant responds to this argument as follows:

The Examiner's arguments are confusing, since the points made by the Examiner fail to address the core issue of the total absence of Applicant's claimed "plurality of subscriber address books" in the Conmy system. The Conmy system is directed exclusively to a meeting scheduling system and as such, it maintains a single address file (212) that lists all users and does not even hint at the ability of subscribers to create and maintain their own personal address books, which list a

plurality of individuals and their personal address data. As noted in the Conmy Patent:

> It is another object of the invention to provide an electronic calendar with group scheduling that operates in a client/server environment, where a name and address book is stored for users within a domain, and a profile document is stored for each user with user availability information contained in the profile. (column 1, lines 60-65)

Instead of the clear meaning of this description that there is a single address file (212) that stores the address data of all users, the Examiner has drawn a correspondence between Applicant's claimed "a plurality of subscriber address books, each said address book comprising a plurality of entries, each entry corresponding to a named individual" and the Examiner's assertion "that names and address are related to user profiles or treated to be users personal address book used for group scheduling based on user availability." **The maintenance of a single address list (212) of users in the Conmy system fails to correspond to Applicant's claimed "plurality of subscriber address books".**

In addition, the Examiner converts the distributed nature of the single address list (212) of the Conmy Patent into Applicant's claimed "plurality of subscriber address books" by the following remarks: "Conmy specifically suggests for example Fig 1 may comprise one or more databases element 200 storing one or more profiles element 202, therefore, storing one or more user profile, one or more user personal address books associating individual address data is integral part of Conmy's teaching." However, **the Examiner fails to reference a single instance in the Conmy Patent where the individual users are described as creating and maintaining their own personal address books.**

The Examiner further noted:

> 31. At page 5, line 19-20, Claims 1 and 8, 'the Conmy Patent also fails to show or suggest the coordinated management of the users' personal address books in the form of address updates'
>
> As to the above argument, Examiner disagree with the applicant because firstly Conmy is directed to automated scheduling techniques for network based electronic calendars, schedulers, and tasking system for groups of users, more specifically scheduling events involving multiple participants or users based on user profiles, user calendar events that associated with names and addresses [see fig 1, col 3, line

38-55], secondly as discussed above Fig 1 may comprise one or more databases element 200 storing one or more profiles element 202, therefore, storing one or more user profile, one or more user personal address books associating individual address data is integral part of Conmy's teaching, thirdly, Conmy specifically teaches database(s) periodically updated and replicated to various sites, more specifically database(s) collects information up-to-date available information from every user on the system and periodically updated accordingly in order to maintain and share information across network [col 4, line 6-30], therefore, Conmy teaches or suggests updated information maintained in the database(s) as detailed in fig 1.

Applicant responds to this argument as follows:

The Examiner has again morphed the plain meaning of the Conmy Patent away from the meeting scheduling focus into the Examiner's interpretation of Applicant's address book system. In particular, the Examiner is correct in noting: "firstly Conmy is directed to automated scheduling techniques for network based electronic calendars, schedulers, and tasking system for groups of users, more specifically scheduling events involving multiple participants or users based on user profiles, user calendar events that associated with names and addresses." However, the Examiner then converts the distributed elements of the single address file (212) into multiple independent "one or more user profile, one or more user personal address books" even though the Conmy Patent is devoid of such a suggestion. The Conmy system uses a database to manage the data stored therein and retrieves data from the distributed segments of the single address file (212), since there are potentially many servers in the Conmy system and these servers are likely to be distributed in their locations. **The need to coordinate multiple copies of an individual's address data in multiple subscriber's personal address books is not even hinted at in the Conmy Patent, since there is no "plurality of subscriber address books" as claimed by Applicant.**

The Examiner also noted:

32. At page 6, line 20-23, page 7, line 1-3, Claims 1 and 8, Conmy Patent fails to show or suggest applicant's recited "means for storing a plurality ......"

As to the above argument(s) examiner refers above detailed office action, for example 'means for storing a plurality of subscriber address books, each said address book comprising a plurality of entries,

each entry corresponding to a named individual' [col 1, line 60-67, col 2, line 1-3, col 3, line 45-55, fig 1]. Conmy specifically teaches database element 200 stores one or more profiles, element 202, one or more calendar files element 210, and one or more name and addresses files element 212 as detailed in fig 1, further it is noted that name and addresses file element 212 containing list all of the names and electronic mail addresses for a plurality or all of the users as detailed in col 3, line 51-53, also it is noted that Conmy specifically teaches for example name and address file may be created for each invitee. [col 3, line 52-53], the user calendar file(s) are associated with user profiles, names and address as detailed in fig 1, subscriber address books corresponds to users specific profiles that containing specific user stored names and address stored in a database such as detailed in col 34-42, subscriber address book(s) corresponds to user(s) profile(s) containing names and addresses as detailed in fig 1, plurality of entries corresponds to entries in the database that related to user events for example profile information, busy time creation information and like as detailed in fig 1-2.

Applicant responds to this argument as follows:

The above-noted arguments are applicable to the Examiner's comments and the following summary comments are appropriate to again emphasize.

A.   The maintenance of a single address list (212) of users in the Conmy system fails to correspond to Applicant's claimed "plurality of subscriber address books".

B.   the Examiner fails to reference a single instance in the Conmy Patent where the individual users are described as creating and maintaining their own personal address books.

C.   The need to coordinate multiple copies of an individual's address data in multiple subscriber's personal address books is not even hinted at in the Conmy Patent, since there is no "plurality of subscriber address books" as claimed by Applicant.

Thus, the Examiner's attempt to read the meeting scheduling system of the Conmy Patent on Applicant's data management system for automatically maintaining address information in a plurality of subscriber address books fails due to the fact that a meeting schedule is NOT an address book that is created and maintained by an individual subscriber. The fact that the Conmy system maintains a single address list

(inaccessible by the users) of all the users who are served by the system does not by any stretch of the imagination correspond to Applicant's system that enables subscribers to create their own personal address books, listing individuals and their address information, and Applicant's claimed automated updating of the address information in each subscriber's personal address book when the address information for an individual listed in the address book changes.

Previously Submitted Arguments - O'Flaherty Patent

The Examiner further rejected claims 15-16, 24-25 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No 6,253,203, issued to O'Flaherty and claims 17-23, 26-32 under 35 U.S.C. §103 as being unpatentable over the O'Flaherty Patent as applied to claims 15, 24 and further in view of published PCT Application WO 94/16398 to Page, noting with respect thereto:

> As to claims 15, 24, O'Flaherty teaches a system which including 'a data management system for automatically maintaining user data among a plurality of communities, each of which contains a plurality of members' [see Abstract, col 2, line 21-29], database management system corresponds to O'Flaherty's fig 1, automatically maintaining user data among a plurality of communities corresponds to collection of personal data of individual user or consumer or customer for example proliferation of membership as detailed in col 2, line 21-29, plurality of communities corresponds to banking, shopping, and the like as detailed in col 1, line 57-63, 'means for storing, for each of a plurality of communities, community membership data comprising a plurality of entries, each entry corresponding to a named individual who is a member of said community' [col 1, line 57-67, col 2, line 57-67, col 7, line 1-15], examiner interpreting plurality of entries, each entry corresponding to a named individual corresponds to O'Flaherty fig 2A, 3A, community membership corresponds to either banking, credit card transaction profile and the like as detailed in col 1, line 57-60, 'storing a set of individual data for each of said individuals listed as a member in each community for said plurality of communities' [see fig 2A, 3A], O'Flaherty specifically teaches for example a logical model of the secure data warehouse that containing customer table element 202 having identity information, personal information, as detailed in fig 2A, 3A, 'providing a user with access to a set of said individual data of an identified individual who is a member of a same community as said user' [col 8, line 35-49], O'Flaherty teaches privileged view element 262 permits viewing, analysis, and alteration of information, more specifically user to view, specify, and change consumer privacy preferences as detailed in col 8, line 45-49, 'responsive to a change in individual data

associated with said identified individual, for propagating said change to all of said plurality of communities in which said individual is a member' [col 8, line 35-47, col 10, line 9-16, line 32-39]. O'Flaherty teaches updating consumer or customer's privileged requirements for example inserting new customers, deleting old customer, and customer's profile and like, further it is also noted that detailed customer profile is collected and propagated to database as detailed in col 10, line 35-39.

Applicant has carefully reviewed the cited O'Flaherty Patent and the Examiner's remarks and presents the following arguments in support of patentability.

The O'Flaherty Patent discloses a privacy enhanced database that controls access to the consumer data stored therein via a dataview operation which has a privacy mask. Each consumer can set a consumer privacy parameter that defines the range of access permitted to the data that they have stored in the database. The O'Flaherty privacy scheme reviews a requesting entity's data privileges and compares these with the consumer privacy parameter set by the consumer who owns the portion of the data requested by the requesting entity. If the requesting entity's data privileges match the consumer privacy parameter set by the consumer, then access to the data is permitted. However, the O'Flaherty system does not operate to manage a plurality of community address books or automatically change an individual's address book data for all subscribers who are members of the same community and who have this individual listed in their personal address book.

In contrast, Applicant's address book maintenance system propagates changes to the address book entry data corresponding to an identified individual, as entered by a subscriber into their address book, to all other address book entries corresponding to the identified individual in the address books of other subscribers, where the subscriber is a member of the same community as the identified individual. Thus, each subscriber maintains their own address book of individuals, and Applicant's system ensures that all the entries in all of the subscribers' address books are consistent. For example, when an individual moves, their address data, when changed by one subscriber, is automatically changed for all subscribers who are members of the same community and who have this individual listed in their personal address book. This structure is clearly stated in claim 15 for example:

A data management system for automatically maintaining user

data among a plurality of communities, each of which contains a plurality of members, comprising:

means for storing community membership data for a plurality of communities, each said community comprising a plurality of entries, each entry corresponding to a named individual who is a member of said community and including a set of individual data for each of said individuals;

means for providing a user with access to a set of said individual data of an identified individual who is a member of a same community as said user; and

means, responsive to a change in individual data associated with said identified individual, for propagating said change to all of said plurality of communities in which said individual is a member.

Thus, Applicant believes that claims 15, 24 are allowable under 35 U.S.C. §102(e) over the cited O'Flaherty Patent and claims 17-23, 26-32 are allowable under 35 U.S.C. §103 over the Conmy Patent as applied to claims 15, 24 and further in view of published PCT Application WO 94/16398 to Page since these claims depend on an allowable base claim.

Response to Examiner's Response to Arguments - O'Flaherty Patent

With regard to the O'Flaherty reference, the Examiner noted:

> 34. At page 8, line 13-16, Claims 15, 24, O'Flaherty system does not operate to manage a plurality of community address books or automatically change an individuals address ....
>
> As to the above argument, examiner disagree with the applicant because firstly, O'Flaherty is directed to privacy enhanced database, more specifically, database management that is to collect user or customer data, analyze data [see Abstract], secondly, O'Flaherty teaches a community in which user or customer is part of that community such as shopping, banking and like [col 1, line 57-63], thirdly, O'Flaherty maintains user or customer or consumer profile, that identifies potential customers transaction habits or trends and like based on user profile. It is however noted that applicant arguments are directed to address books, individual address book data ...... this language is not found in the independent Claims 15 and 24.

Applicant responds to this argument as follows:

The Examiner has noted a flaw in Applicant's previously stated arguments. Applicant believes that the term "address book" should be deleted from the arguments, but the gist of the argument is the same, that the O'Flaherty Patent fails to show or suggest the structure recited in Applicant's claims 15, 24 and these claims

are therefore allowable under 35 U.S.C. §103(a).

Summary

The Applicant requests a Notice of Allowance in this application in light of the amendments and arguments set forth herein. The undersigned attorney requests Examiner Channavajjala to telephone if a conversation could expedite prosecution. Applicant authorizes the Commissioner to charge any additionally required payment of fees to deposit account #50-1848.

Respectfully submitted,

Patton Boggs, LLP

Dated: ___1/9/04___

By: _____

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